

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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FANNIE MAE,

Civil No.: 07-CV-3598 (SCR)

Plaintiff,

- against -

PLAINTIFF'S  
INITIAL DISCLOSURE

YITZCHOK ALTMAN and  
YITZCHOK STEFANSKY,

Defendants.  
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Plaintiff, for its Initial Disclosure pursuant to FRLP 26 (A)(1), provides the following:

A. The individuals likely to have discoverable information that plaintiff may use to support its claim are the following:

1. Raymond A. LaRocco  
Sovereign Bank  
195 Montague Street  
Brooklyn, New York 11201  
347-563-9340
2. Clifford Blasberg  
Sovereign Bank  
195 Montague Street  
Brooklyn, New York 11201  
347-563-9262
3. Neville Moore  
Sovereign Bank  
195 Montague Street  
Brooklyn, New York 11201  
347-563-9366

Those individuals have information regarding "what was paid and what is owed," which, counsel for defendants advises, is the only remaining issue ("the Issue") in this action.

B. (1) The documents, electronically stored information and tangible things relating to the Issue that are in plaintiff's possession, custody or control and may be used to support its

claims are the following:

1. Multifamily Notes, Multifamily Mortgage, Assignment of Rents and Security Agreement, Assignment of Mortgage, Assumption, Modification and Release Agreements, April 17, 2007 letter and Guarantee Agreement, copies of all of which are attached to the Complaint in this action.

B. (2) Sovereign Bank's Servicing File regarding subject loan including:

- a. copies of all correspondence on loan
- b. records as to loan advances
- c. insurance and insurance premium advance information
- d. inspection reports
- e. utility and utility advance records, and
- f. real estate tax and advance records

(3) Computer history of loan payment recording commencement date of default.

C. Plaintiff computes its damages as of August 3, 2007 as follows:

1.	guarantee amount	\$608,042.64
2.	interest at 7.19% from 3/1/07 to 4/30/07	7,286.38
3.	interest at 16% default rate from 5/1/07 to 8/3/07	25,132.43
4.	utility advances	52,286.43
5.	water charges	71,683.05
6.	insurance premium advances	7,500.00
		<u>\$772,930.92</u>

Dated: Garden City, New York  
August 8, 2007

CULLEN AND DYKMAN LLP

By: 

Peter J. Mastaglio (PM 8303)  
Attorneys for Plaintiff  
100 Quentin Roosevelt Boulevard  
Garden City, New York 11530  
(516) 357-3700

TO:  
Paul Savad & Associates  
55 Old Turnpike Road  
Nanuet, New York 10954  
Attn: Susan Cooper, Esq.

STATE OF NEW YORK)

ss.:

COUNTY OF NASSAU)


MAUREEN SAUTER, being duly sworn, deposes and says:

That she is over the age of 21 years, resides at Massapequa, New York and is not a party to this action.

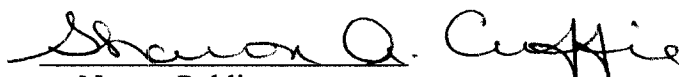
That on the 8<sup>th</sup> day of August, 2007 she served the within Plaintiff's Initial Disclosure by depositing a true copy thereof in a properly sealed wrapper, in a depository maintained by Federal Express located on the premises at Garden City Center, 100 Quentin Roosevelt Boulevard, Garden City, New York, addressed as follows:

Susan Cooper, Esq.  
Paul Savad & Associates  
55 Old Turnpike Road  
Suite 209  
Nanuet, New York 10954-2450

that being the addresses designated on the latest papers served by them in these actions and proceedings.

  
MAUREEN SAUTER

Sworn to before me this  
8<sup>th</sup> day of August, 2007.

  
Notary Public

**Sharon A. Caffie**  
**Notary Public, State of New York**  
**No. 01CU6020584**  
**Qualified in Suffolk County**  
**Commission Expires March 01, 20** 11